

DEPARTMENT OF THE NAVY

BASE REALIGNMENT AND CLOSURE PROGRAM MANAGEMENT OFFICE WEST 1455 FRAZEE RD, SUITE 900 SAN DIEGO, CA 92108-4310 M60050_003464 MCAS EL TORO SSIC NO. 5090,3,A

5090 Ser BPMOW.CA/ 0172 February 27, 2006

Mr. Richard Muza Remedial Project Manager U.S. Environmental Protection Agency, Region IX 75 Hawthorne St (Mail Code SFD-8-1) San Francisco, CA 94105

Mr. Frank Cheng Remedial Project Manager California Department of Toxic Substances Control Office of Military Facilities 5796 Corporate Ave Cypress, CA 90630

Mr. John Broderick Remedial Project Manager California Regional Water Quality Control Board 3737 Main Street, Suite 500 Riverside, CA 92501

SUBJECT: FEDERAL FACILITY AGREEMENT APPENDIX A SCHEDULE EXTENSION REQUEST FOR INSTALLATION RESTORATION PROGRAM (IRP) SITES 1, 2, 3, 5, 8, 12 AND ANOMALY AREA 3, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA

Fellow Federal Facility Agreement (FFA) Representatives:

This letter provides an updated Former Marine Corps Air Station (MCAS) El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary submittal documents (enclosure (1)) and includes schedule extension requests for Installation Restoration Program (IRP) Site 1 (Explosive Ordnance Disposal [EOD] Range), Site 2 Groundwater (Magazine Road Landfill), Sites 3 and 5 (Original and Perimeter Road Landfills), Sites 8 and 12 (DRMO Storage Yard and Sludge Drying Beds), and Anomaly Area 3. Enclosures (2) through (6) provide updated project schedules for the remaining environmental IRP efforts identified per the FFA for the aforementioned sites.

The following site tables identify the eight primary submittals and the associated schedule extensions relating to these requests made pursuant to FFA Sections 9.2(d) and 9.2(g).

Primary Submittal IRP Site 1	Current Deliverable Date	Revised Deliverable Date	Extension
Draft Feasibility Study	04-03-2006	06-15-2006	~2 months
Draft Proposed Plan	09-08-2006	11-22-2006	~2 months
Draft Record of Decision	02-01-2007	04-17-2007	~2 months
Primary Submittal	Current	Revised	Extension
IRP Site 2 Groundwater Draft Record of Decision	Deliverable Date 05-09-2006	Deliverable Date 09-29-2006	~5 months
Primary Submittal	Current	Revised	Extension
IRP Sites 3 & 5	Deliverable Date	Deliverable Date	
Revised Draft Record of Decision	04-14-2006	09-28-2006	~5 months
Primary Submittal IRP Sites 8 and 12	Current Deliverable Date	Revised Deliverable Date	Extension
Revised Draft Record of Decision	02-27-2006	05-19-2006	~3 months
Primary Submittal	Current	Revised	Extension
Anomaly Area 3	Deliverable Date	Deliverable Date	
Draft Proposed Plan	04-11-2006	05-08-2006	1 month
Draft Record of Decision	09-20-2006	10-18-2006	1 month

As discussed at the January 25, 2006 Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting, the above project schedules have been updated. In revising the project schedules, the Navy has accounted for document sequencing and critical path items that have the potential to affect multiple projects. Obtaining agency concurrence on certain preceding documents would promote program consistency, reduce the team's effort associated with document review and revision, and improve document quality.

IRP Site 1 requires revised deliverable dates for the Draft Feasibility Study (FS), Draft Proposed Plan (PP) and Draft Record of Decision (ROD) based on an agency request to allow for additional time to review the Draft Remedial Investigation (RI) response to comments as outlined in enclosure (2). Due to the complex nature of this site, emerging technical issues, and intricate risk assessments, including an ecological assessment, additional time is necessary to discuss and resolve issues integral to the successful completion of subsequent milestones. In addition, this extension will allow for the Radiological Release Report conclusions to be incorporated into the draft Feasibility Study.

As previously discussed, the Navy will be issuing a final ROD for both IRP Sites 2 and 17. This ROD will present the selected remedy for IRP Site 2 groundwater and document the selected remedy for Site 2 soil and Site 17 soil and groundwater as presented in the interim ROD. As a result, a revised deliverable date is necessary for the Draft ROD to address these aspects for IRP Sites 2 and 17. Specifically, additional time is necessary for the Site 2 groundwater remedy

to submit the results of the recently completed groundwater evaluation and microcosm study. In addition, this request will allow for regulatory agency review of the *Draft Technical Memorandum, Evaluation Of The Selected Remedy With Respect to Radionuclides Operable Unit 2B, IRP Sites 2 & 17, Former Marine Corps Air Station El Toro, February 2006.* This document was prepared to address previous ROD commitments and presents an evaluation of the results of the radiological investigation with respect to the performance of selected landfill capping remedy for these sites. These documents provide supporting information, which is essential to both the PP and the Draft ROD. The schedule reflecting these additional reviews is provided as enclosure (3).

IRP Landfill Sites 3 and 5 require a revised deliverable date for the Revised Draft ROD. As discussed at our January BCT meeting, the critical path items for completion of the Revised Draft ROD includes concurrence on the *Radiological Report and Technical Memorandum*, Evaluation Of The Selected Remedy With Respect to Radionuclides Operable Unit 2B, IRP Sites 2 & 17 and the Radiological Report. Completion of these milestones is essential to providing a cohesive ROD, which accurately delineates the radionuclide evaluation and are reflected in enclosure (4). The Navy is proceeding with the preparation of supporting documents in order to meet the proposed milestones.

IRP Sites 8 and 12 require a revised deliverable date for the Revised Draft ROD based on additional time needed to complete preceding milestones as illustrated in enclosure (5). The completion of the FS Addendum was delayed due to technical issues on related radiological release limits. In response to agency concerns, the team has worked diligently to resolve issues pertaining to the FS Addendum. On 13 February 2006, the Final FS Addendum was issued to the agencies, which will allow this project to proceed.

Anomaly Area 3 requires revised deliverable dates for the Draft PP and Draft ROD based on an agency request, per the FFA, to extend the review time period for the Draft RI/FS Report by 30 days. All subsequent milestones have been extended to accommodate this additional review time as shown in enclosure (6).

All of the activities described above are acceptable causes for extensions per the FFA, Section 9. Thank you in advance for your cooperation and continued support. Given the nature of the proposed changes and the resolution at the January 25, 2006 BCT meeting, the Navy appreciates your timely concurrence with these extension requests. Should you have questions or need additional information, please contact Ms. Content Arnold, Lead Remedial Project Manager, at (619) 532-0790 or Darren Newton at (619) 532-0963.

Sincerely,

DEAN GOULD

Base Closure Manager
By direction of the Director

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Enclosures:

- 1. Federal Facility Agreement Appendix A Schedule, Former MCAS El Toro (February 2006)
- Site 1 EOD Range Project Schedule, Former MCAS El Toro
 Site 2 Groundwater Project Schedule, Former MCAS El Toro
- 4. Sites 3 and 5 Project Schedule, Former MCAS El Toro5. Sites 8 and 12 Project Schedule, Former MCAS El Toro6. Anomaly Area 3 Project Schedule, Former MCAS El Toro

Copy to:

Commandant of the Marine Corps Attn: LCDR Tricia Samora, USN 2 Navy Annex, Room 3109 (LFL) Washington, D.C. 20380-1775

Commander Attn: AC/S Environ Mgt Marine Corps Air Bases Miramar P.O. Box 452001 San Diego, CA 92145-2001

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Blind copy to:

05GIH (w/2 copies for Administrative File) 05GIH (w/1 copy for Information Repository) BPMOW:

- D. Gould
- J. Sheetz
- D. Newton
- C. Arnold
- M. Smits
- R. Pribyl
- J. Callian

Read file

Serial file

MARINE CORPS AIR STATION EL TORO **Federal Facility Agreement**

Appendix A Submittal Milestones

Site 1 (Explosive	Ordnance	Disposal	Range)
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Primary Submittal	Deliverable Date
Draft Remedial Investigation	06-03-2005
Draft Feasibility Study	06-15-2006
Draft Proposed Plan	11-22-2006
Draft Record of Decision	04-17-2007

Site 2 Groundwater (Magazine Road Landfill)

Primary Submittal	Deliverable Date
Draft Feasibility Study Addendum	03-28-2005
Draft Proposed Plan	12-08-2005
Draft Record of Decision	09-29-2006

Sites 2 & 17 (Magazine Road and Communication Station Landfills)

Primary Submittal	Deliverable Date
Draft Final Remedial Design	07-19-2004
Draft Operation and Maintenance Plan	06-05-2006
Draft Remedial Action [Closeout] Report	08-30-2006

Sites 3 & 5 (Original and Perimeter Road Landfills)

Primary Submittal	Deliverable Date
Draft Feasibility Study Addendum	03-07-2005
Revised Draft Proposed Plan	05-05-2005
Revised Draft Record of Decision	09-28-2006

Anomaly Area 3

Primary Submittal	Deliverable Date
Draft Remedial Investigation/Feasibility Study	12-06-2005
Draft Proposed Plan	<i>05-08-2006</i>
Draft Record of Decision	10-18-2006

Sites 8 (DRMO Storage Yard) & 12 (Sludge Drying Beds)

Primary Submittal	Deliverable Date
Draft Feasibility Study Addendum	03-09-2005
Revised Draft Proposed Plan	04-01-2005
Revised Draft Record of Decision	05-19-2006

MARINE CORPS AIR STATION EL TORO **Federal Facility Agreement Appendix A Submittal Milestones**

Site 11 (Transformer St	torage Yard)
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Primary Submittal	Deliverable Date
Draft Remedial Action Work Plan	06-30-2004
Draft Project Closeout Report	10-06-2005

Site 16 (Crash Crew Pit No. 2)

Primary Submittal	Deliverable Date
Draft RD/RA MNA Work Plan	11-18-2003
Draft Remedial Design	07-27-2005
Draft Operating Properly and Successfully	03-02-2006
(OPS) Report	

Site 18 (VOC Regional Groundwater Plume)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	03-14-2005
Final Remedial Design (100% Design)	05-31-2005
Draft Operation & Maintenance Plan	09-11-2006
Draft Project Closeout Report	03-30-2007

Site 24 (VOC Source Area – Shallow Groundwater Unit)

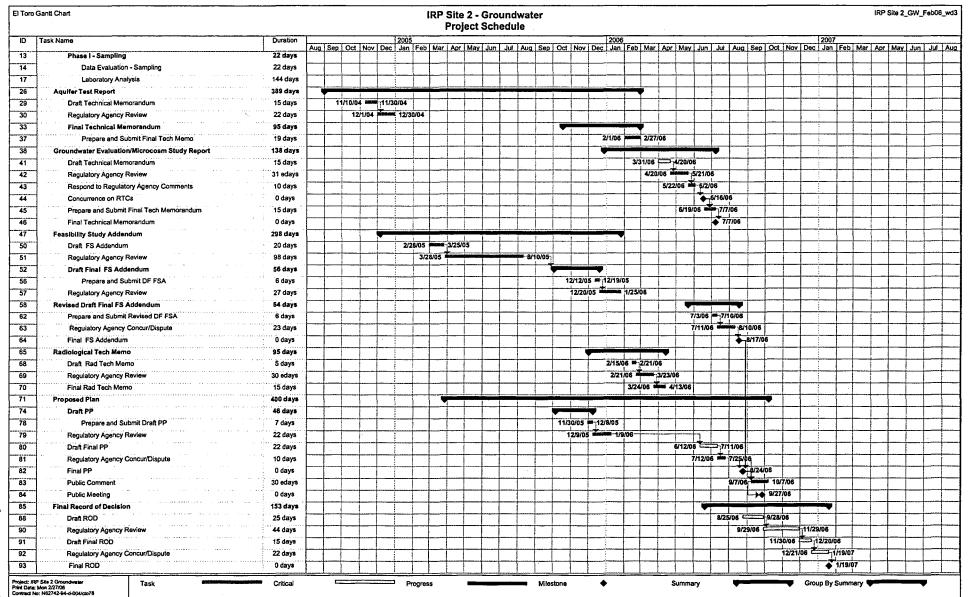
Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	06-02-2004
Final Remedial Design (100% Design)	12-13-2004
Draft Operation & Maintenance Plan	09-11-2006
Draft Project Closeout Report	03-30-2007

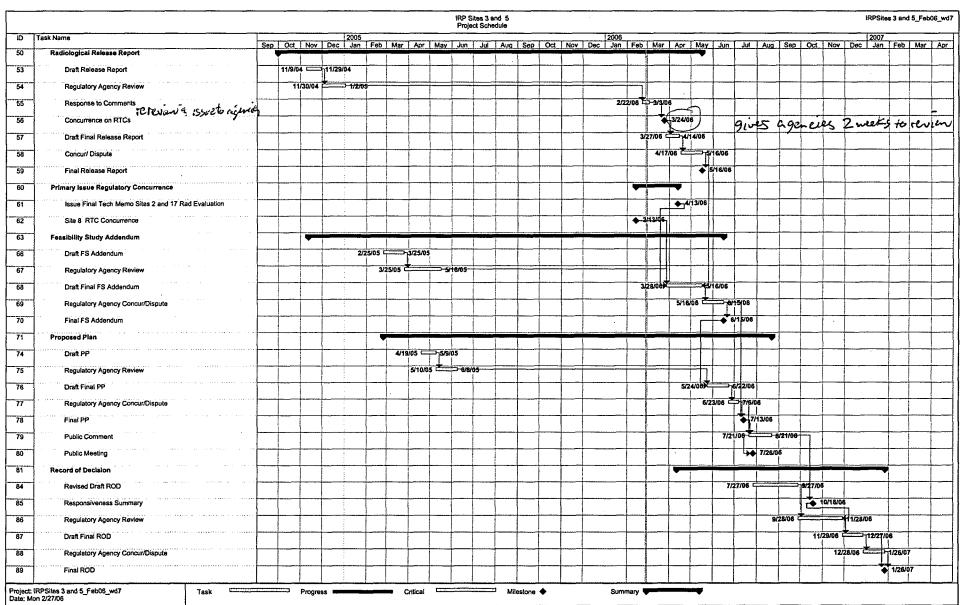
Site 24 (VOC Source Area – Vadose Zone Soil)

Primary Submittal	Deliverable Date
Draft Proposed Plan	04-01-2005
Draft Record of Decision	08-25-2005

1.WP IRP Site 1 Feb06 wd1 Project Schedule Phase II Remedial Investigation/Feasibility Study Site 1 - EOD Range, MCAS El Toro ID Task Name Duration Start 1 Work Plans 475 days Wed 3/8/00 Mon 12/31/01 20 Field Investigation 815 days Wed 1/2/02 Tue 2/15/05 Field Investigation 43 Data Evaluation 644 days Fri 8/23/02 Wed 2/9/05 Data Evaluation Ecological Risk Assessment 48 Ecological Risk Assessment 481 days Fri 2/7/03 Fri 12/10/04 60 Radiological Release Report Radiological Release Report 158 days Fri 9/24/04 Tue 5/3/05 76 465 days Treatability Study Mon 10/11/04 Fri 7/21/06 Treatability Study 77 158 days Mon 10/11/04 Wed 5/18/05 Treatability Study Work Plan 👿 Treatability Study Work Plan 84 193 days Treatability Study Implementation Treatability Study Implementation Thu 5/19/05 Mon 2/13/08 91 114 days Fri 7/21/08 Treatability Study/Aquifer Test (TS) Report Treatability Study/Aquifer Test (TS) Report Tue 2/14/06 94 Draft TS Report 22 days Fri 4/21/06 Mon 5/22/06 4/21/06 #-5/22/06 95 Tue 5/23/06 Wed 6/21/06 5/23/06 Regulatory Agency Review 22 days 6/22/06 96 Final TS Report 22 days Thu 6/22/06 Fri 7/21/06 68 RI Report 338 days Tue 2/1/05 Thu 5/18/06 5/4/05 - 6/2/05 71 Draft RI Report 22 days Wed 5/4/05 Thu 6/2/05 6/3/05 9/2/05 72 Regulatory Agency Review 66 days Fri 6/3/05 Fri 9/2/05 2/1/06 73 Draft Final RI 55 days Wed 2/1/06 Tue 4/18/06 4/19/08 5/18/06 74 22 days Thu 5/18/06 Regulatory Agency Concur or Dispute Wed 4/19/06 75 Final RI Report 0 days Thu 5/18/06 5/18/06 Thu 5/18/06 FS Report 97 FS Report 206 days Mon 1/2/06 Mon 10/16/06 100 Draft FS Wed 6/14/06 5/25/06 D 6/14/06 15 days Thu 5/25/06 6/15/06 - 8/15/06 101 44 days Thu 6/15/06 Tue 8/15/08 Regulatory Agency Review 8/16/06 9/14/06 102 Draft Final FS 22 days Wed 8/16/06 Thu 9/14/06 103 9/15/08 10/16/06 Regulatory Agency Concur or Disput 22 days Fri 9/15/06 Mon 10/16/06 104 Final FS 0 days Mon 10/16/06 Mon 10/16/08 10/16/08 105 Proposed Plan Wed 4/4/07 Proposed Plan 154 days Fri 9/1/06 108 Draft PP Thu 11/2/06 Tue 11/21/06 11/2/06 0-11/21/06 14 days 109 22 days Wed 11/22/06 Thu 12/21/06 11/22/06 12/21/06 Regulatory Agency Review 110 Draft Final PP 22 days Fri 12/22/06 Mon 1/22/07 12/22/08 -1/22/07 1/23/07 H 2/5/07 111 10 days Tue 1/23/07 Mon 2/5/07 Regulatory Agency Concur/Dispute 112 Final PP 0 days Mon 2/19/07 Mon 2/19/07 2/19/07 113 22 days /6/07**>≅** 4/4/07 Public Commen Tue 3/6/07 Wed 4/4/07 114 Record of Decision scord of Decision 184 days Fri 12/22/06 Wed 9/5/07 Draft ROD 20 days Mon 4/16/07 3/20/07 13-4/16/07 117 Tue 3/20/07 119 Tue 4/17/07 Mon 6/18/07 4/17/07 Regulatory Agency Review 45 days 5/7/07 118 Responsiveness Summary 0 days Mon 5/7/07 Mon 5/7/07 6/19/07 \$46/07 120 Draft Final ROD 35 days Tue 6/19/07 Mon 8/6/07 22 days Wed 9/5/07 8/7/07 9/5/07 121 Regulatory Agency Concur/Dispute Tue 8/7/07 122 Final ROD 0 days Wed 9/5/07 Wed 9/5/07 9/5/07 Project:Phase II RI EOD Range, Sita 1 Print Date: Fri 2/17/08 Contract No: N62742-94-D004/CTO72 Task Mileston Summary Project Summary \







El Toro C	Santt Chart		Project	8 and 12 Schedule El Toro									Site 8	and 12_	_Feb0	3_wd
ID	Task Name	Duration	Start	2005		2	006				2007				2008	
2	Feasibility Study Addendum	312 days	Mon 12/6/04	Oct Jan Apr	Jul	Oct J	an	Apr	Jul	Oct	Jan	Apr	Jul	Oct	Jan	Apr
5	Draft FS Addendum	21 days	Wed 2/9/05	2/9/05 2/9/05		:			<u> </u>							
6	Regulatory Agency & Navy Review	63 edays	Wed 3/9/05	3/9/05 5/1	1/05									en e		
7	Draft Final FS Addendum	21 days	Tue 6/21/05	6/21/05	7/19	/05	+		<u> </u>							
8	Issue Responses to Supplemental Comments	0 days	Mon 12/5/05			1	2/5/0	5						. de colonidado, en que		
9	Comment Resolution Meeting	0 days	Wed 12/14/05			• 1	2/14	V05								
11	Regulatory Agency Concur/Dispute	10 days	Mon 1/16/06		4	/16/06 #	1/2	7/06								İ
12	Final FS Addendum	10 days	Wed 2/1/06			2/1/06	2/	14/06	<u> </u>							
13	Proposed Plan	320 days	Thu 2/3/05													
16	Draft PP	10 days	Fri 3/18/05	3/18/05 3/31/0	5											
17	Regulatory Agency Review	22 days	Fri 4/1/05	4/1/05 5/2/	05	-										ĺ
18	Draft Final PP	8 days	Mon 2/13/06			2/13/06	2/	22/06								
19	Regulatory Agency Concur/Dispute	10 days	Thu 2/23/06			2/23/06	4 3	3/8/06								
20	Final PP	0 days	Wed 3/22/06				•	3/22	/06							
22	Public Comment	30 edays	Mon 3/27/06			3/27/	C6	3 4/2	6/06							
21	Public Meeting	0 days	Wed 3/29/06					3/2	9/06							
23	Record of Decision	158 days	Thu 2/9/06													
26	Draft ROD	17 days	Wed 4/26/06			4/2	6/06	1 5	18/06							
28	Regulatory Agency Review	44 days	Fri 5/19/06			5	/19/0	06	7/19	9/06						
27	Responsiveness Summary	0 days	Thu 6/8/06	:	<u></u>		$\dagger \dagger$	•	6/8/0	6						
29	Draft Final ROD	21 days	Thu 7/20/06				7	/20/06	8/	17/06						
30	Regulatory Agency Concur/Dispute	22 days	Fri 8/18/06				11	8/18/	06	9/18/0	6					**********
31	Final ROD	0 days	Mon 9/18/06						•	9/18/	06			***************************************		
Print Date: F	ie II RI EOD Range, Site 1		Milestone Summary	*	_	Projec	t Sui	mmary	/ 🐓			7				

Enclosure (6)